

Hon. Timothy W. Dore
In Proceedings Under
Chapter 13
Hearing Date: January 5, 2022
Time: 9:30 AM
Response Date: December 29, 2021
Location: 700 Stewart Street,
Seattle, WA 98101

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

Beverly Jane Cary,

Debtor(s),

Case No: 20-12450 TWD

NOTICE AND MOTION FOR ORDER
AUTHORIZING EMPLOYMENT OF SPECIAL
COUNSEL TO PURSUE CLAIMS

NOTICE

JUDGE: Timothy W. Dore

TIME: 9:30 AM

PLACE: 700 Stewart Street, Seattle, WA 98101

DATE: January 5, 2022

IF YOU OPPOSE the Motion, you must file your written response with the court clerk, and deliver copies to the undersigned NOT LATER THAN THE RESPONSE DATE, which is December 29, 2021.

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING WITHOUT FURTHER NOTICE, and strike the hearing.

NOTICE AND MOTION FOR ORDER
AUTHORIZING EMPLOYMENT OF SPECIAL
COUNSEL TO PURSUE CLAIMS -- 1

Law Office of Mark McClure, P.S.
1103 West Meeker Street, Ste 101
Kent, WA 98032
(253) 631-6484

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BACKGROUND

The Law Firm of Mark C. McClure, PS and Christina Henry of Henry & DeGraaff, PS (“Law Firms”) were employed special counsel for the purpose of pursuing any and all claims resulting from a dispute with Patch Homes, Inc.; Patch Services LLC, Patch Capital Partners Fund I, LP, Jordan Breighner, Adam Hitchcock, Sundeep Ambati, and First American Title Insurance Co., for violations of the Washington State Consumer Protection Act under RCW 19.86 et seq. The employment was approved and an order was entered. See ECF #82. Debtor now wishes to expand this employment to include Melissa Huelsman of the Law Offices of Melissa A. Huelsman, P.S.

MOTION

Accordingly, Debtor, by and through counsel, moves the court for an order authorizing employment of the Law Firm of Mark C. McClure, PS, Henry & DeGraaff, PS, and the Law Offices of Melissa A. Huelsman, P.S. (“Law Firms”) as special counsel for the purpose of pursuing any and all claims resulting from a dispute with Patch Homes, Inc.; Patch Services LLC, Patch Capital Partners Fund I, LP, Jordan Breighner, Adam Hitchcock, Sundeep Ambati, and First American Title Insurance Co., for violations of the Washington State Consumer Protection Act under RCW 19.86 et seq.

1. The retainer agreement is a contingent fee agreement. A true and correct copy of this fee agreement is attached hereto as **Exhibit A**.

WHEREFORE, Applicant prays that she be authorized to employ counsel above to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as this Court may hereinafter determine from the proceeds (including reduction of claim) any settlement or award related to the subject claim(s).

DATED: November 24, 2021

/s/ Mark C McClure

Mark C. McClure, WSBA # 24393
Attorney for Debtor(s)

NOTICE AND MOTION FOR ORDER
AUTHORIZING EMPLOYMENT OF SPECIAL
COUNSEL TO PURSUE CLAIMS -- 2

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